

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE

FELIX ANGEL FALCON FIGUEROA  
MYRNA JURADO RODRIGUEZ

DEBTORS

CASE NO. 15-04065 MCF

CHAPTER 13

**APPLICATION FOR LEAVE TO RETAIN REALTOR**

TO THE HONORABLE COURT:

**COME NOW FELIX ANGEL FALCON FIGUEROA and MYRNA JURADO RODRIGUEZ**, the Debtors in the above captioned case, through the undersigned attorney, and respectfully state and pray as follows:

1. The Debtors seek to employ, Samuel Centeno-Negron of Roger Professional Realty, Inc., Urb. Jardines I #2 1<sup>st</sup> Street Cayey PR 00736, to procure the sale of a real property pertaining to the Estate located at: Bayamon Ward Montellano Sector Road 173 Km. 4.7 Interior Aguas Buenas Puerto Rico 00703.
2. Samuel Centeno-Negron will be responsible of all selling and marketing efforts and will conduct the sale of the property in accordance to the notice of sale to be filed with the Court.
3. To the best of the Debtors' knowledge, the professional whose employment is sought has no connection with the Trustee, the Debtors, the creditors, any parties in interest, their respective attorneys or accountants, the Office of the US Trustee or any person employed by said Office.
4. The Debtors further believe that in the discharge of Mr. Centeno's duties, the firm and its representative(s) will not hold any interest adverse to the herein Estate and will be a disinterested person as defined by 11 U.S.C. §§101 (14), 327.

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5. The proposed realtor will be paid for its services as follows: In the event of a sale procured by Samuel Centeno-Negron/Roger Professional Realty, Inc., in compliance with the terms, conditions, and minimum price detailed in the notice of sale, Samuel Centeno-Negron/Roger Professional Realty, Inc. will receive a commission at the rate of 4% of the gross sales price. These commissions are to be paid by the Estate, after notice and allowance by the Court.

**WHEREFORE**, the Debtors, respectfully request an Order authorizing the Debtors to retain the services of Samuel Centeno-Negron/Roger Professional Realty, Inc., to act as Realtor for the Debtors in the sale of a real property located at: Bayamon Ward Montellano Sector Road 173 Km. 4.7 Interior Aguas Buenas Puerto Rico 00703. and for any further relief this Court deems just and proper under the circumstances.

#### **NOTICE**

**Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.**

**I HEREBY CERTIFY** that a copy of this motion was filed with the Court using the CM/ECF filig system which will send copy of the same to all CM/ECF participants including to: Alejandro Oliveras Rivera, Esq., Chapter 13 Trustee and to the U.S. Trustee's Office, Monsita

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Lecaroz Arribas, Esq., Assistant US Trustee; I also certify that a copy of this motion was sent to the Debtors Felix Angel Falcon Figueroa and Myrna Jurado Rodriguez, HC 04 Box 8009 Aguas Buenas PR 00703 and to all creditors and all parties in interest (non-participants of CM/ECF system) as per mailing matrix attached.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico this 29<sup>th</sup> day of August, 2017.

/s/ Felix Angel Falcon Figueroa  
FELIX ANGEL FALCON FIGUEROA

/s/Myrna Jurado Rodriguez  
MYRNA JURADO RODRIGUEZ

/s/ Roberto Figueroa Carrasquillo  
USDC-PR #203614  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699 FAX NO 787-746-5294  
EMAIL: rfigueroa@rfclawpr.com



IN THE UNITED STATES BANKRUPTCY COURT  
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FELIX ANGEL FALCON FIGUEROA  
MYRNA JURADO RODRIGUEZ

DEBTORS

CASE NO. 15-04065 MCF

CHAPTER 13

**STATEMENT UNDER PENALTY OF PERJURY**  
**PURSUANT TO LBR-DPR 2014-1**

I, Samuel Centeno-Negron of Roger Professional Realty, Inc., declare under penalty of perjury as follows:

1. That I am a Realtor duly licensed by the Commonwealth of Puerto Rico.
2. That I am the Realtor for Debtor in the sale of a real property located at: Bayamon Ward Montellano Sector Road 173 Km. 4.7 Interior Aguas Buenas Puerto Rico 00703, which property is property of the Estate in the above captioned bankruptcy case, and I am the Realtor the Debtors are seeking to employ by the application to which this Declaration is attached as Exhibit #1.
3. That I have experience in the sales and leasing of residential and commercial real properties, that I am qualified to serve as Realtor to the herein Debtors and I am willing to accept employment on the basis set forth in the annexed application.
4. That my office is located at: Roger Professional Realty, Inc., Urb Jardines I #2 1<sup>st</sup> Street Cayey Puerto Rico 00736.
5. That to the best of my knowledge I nor any member of Roger Professional Realty, Inc., holds or represents any interest adverse to the estate of the above-named Debtors and I am and each member of Roger Professional Realty Inc., a "disinterested person" as defined in 11 U.S.C. §101(14), nor I am nor my firm, to the best of my knowledge, related or otherwise connected with Debtors, the United States Trustee, the Debtors' counsel or any person employed by the Office of the

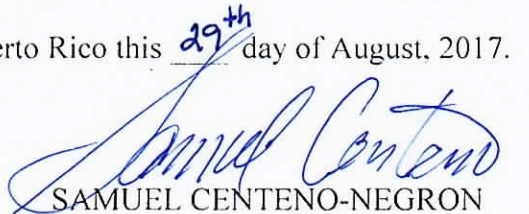
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United States Trustee or to any other party in interest.

6. That there is no agreement to share, except any members of Roger Professional Realty Inc., the compensation to be paid for the services rendered in this case, that I will amend this statement immediately upon the learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstance relating thereto, and that I have reviewed the provisions of LBR-DPR 2016-1.

I declare under penalty of perjury that the foregoing is true and correct, as provided in 28 USC Section 1746. In Cayey, Puerto Rico this <sup>29<sup>th</sup></sup> day of August, 2017.



SAMUEL CENTENO-NEGRON  
ROGER PROFESSIONAL REALTY, INC.  
URB JARDINES I #2 1st STREET  
CAYEY PR 00736  
TEL. 787-717-5823  
EMAIL: [samycenteno@live.com](mailto:samycenteno@live.com)

**SAMUEL CENTENO NEGRON**

(939) 717-5823

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**PROFESSIONAL EXPERIENCE**

<b>Bankers One Real Estate</b> <i>Vendedor Bienes Raíces</i>	Cayey, PR	<b>2008-Present</b>
<b>Center Real Estate</b> <i>Vendedor Bienes Raíces</i>	Caguas, PR	<b>2005-2008</b>
<b>Centeno's Craft and Hobby Supplies</b> <i>Gerente de Ventas</i>	Caguas, PR	<b>1998-2003</b>

**PREPARACION ACADEMICA**

<b>Universidad Interamericana</b> <i>20 créditos conducentes al grado de bachillerato en Administración de Empresas y Mercadeo</i>	Río Piedras, PR	<b>1987-1989</b>
<b>Universidad del Turabo</b> <i>30 créditos conducentes al grado de bachillerato en Administración de Empresas y Mercadeo</i>	Gurabo, PR	<b>1995</b>

**CURSOS**

<b>Caguas Board of Puerto Rico</b> <i>90 horas conducentes a la obtención De licencia de Vendedor de Bienes Raíces</i>	Caguas, PR	<b>2000-2002</b>
<b>Educación Continua</b> <i>Cursos de educación continúa En Ventas y Mercadeo</i>	PR	<b>2002-2010</b>



# SAMUEL CENTENO NEGRON

Urb. Veredas, 187, Camino Las Palmas, Gurabo, PR 00778-9681

(939) 717-5823

[samycenteno@live.com](mailto:samycenteno@live.com)

## TRASFONDO

**Ventas ▪ Bienes Raíces ▪ Inventario ▪ Licencia como vendedor de Bienes Raíces ▪ Servicio al Cliente ▪ Mercadeo ▪ Ventas al por menor (retail) ▪ Cuadre de Caja ▪**

Profesional orientado a los resultados, responsable, con amplia experiencia en **ventas y servicio al cliente**. Trayectoria consistente en la venta de propiedades. Trabaja bajo presión y con un mínimo de supervisión. Excelente manejo de archivos y récord. Habilidad para desarrollar buenas relaciones interpersonales y atender público. Manejo de documentos de forma confidencial. Confiable, flexible y enfocado en realizar tareas de acuerdo a los más altos estándares. Integra su trabajo al esfuerzo conjunto.

## DESTREZAS PROFESIONALES

### Vendedor Bienes Raíces

- Responsable de la venta, alquiler y administración de alquileres de propiedades
- Encargado de realizar contratos con dueños de propiedades disponibles para la venta.
- Encargado de mantener un inventario y realizar mercadeo a propiedades disponibles para la venta.
- Realizar procesos de pre cualificación del cliente comprador con las diferentes instituciones bancarias.
- Mantiene contacto con agencias de gobierno y privadas para facilitar el proceso de venta de la propiedad.
- Mantiene buena relación con el cliente para facilitar la venta o compra de la propiedad

### Gerente de ventas

- Encargado de impulsar las ventas y promover la mercancía, según el plan de ventas y promociones especiales.
- Ordeno mercancía en otras tiendas según solicitud del cliente.
- Mantuvo la mercancía en orden y el área limpia y organizada en todo momento.
- Realizo el inventario y distribución de la mercancía que llegaba a la tienda.
- Asistió al cliente en la búsqueda de mercancía que compraba.
- Realizó cobro de mercancía, manejando efectivo y transacciones de tarjetas de crédito y ATH.